

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEBORAH QUINN,)	
)	
Plaintiff,)	Case No.
)	
v.)	
)	
TRANSWORLD SYSTEMS, INC.)	
)	
Defendant.)	

NOTICE OF REMOVAL

Please take notice that, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Transworld Systems, Inc. (“TSI”) hereby removes the above-captioned civil action from the 22nd Judicial Circuit Court, County of St. Louis, State of Missouri (hereinafter referred to as “the State Court”) to the United States District Court for the Eastern District of Missouri. The removal of this civil action is proper, because:

1. On or about November 4, 2022 plaintiff Deborah Quinn, through her attorney, initiated in the State Court a civil action entitled “*Deborah Quinn, Plaintiff, v. Transworld Systems, Inc., Defendant*,” No. 2222-AC12584 on the docket of the State Court (hereinafter referred to as “the State Court Action”) by filing a Petition (“the Petition”).

2. On or about November 4, 2022 the State Court clerk issued an Associate Division Summons (“the Summons”) directed to TSI.

3. On November 4, 2022 TSI, through its agent for service of process, CT Corporation System (“CT”), was served with the Summons and a copy of the Petition, as reflected in the November 4, 2022 CT Service of Process Transmittal that CT sent to TSI by e-mail, together with the Summons and the Petition.

4. Plaintiff Deborah Quinn’s claim against TSI is based upon the U.S. Fair Debt Collections Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.*

5. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over plaintiff’s claim, because the Petition filed in the State Court Action presents a federal question arising under the FDCPA.

6. Pursuant to 28 U.S.C. § 1441(a), the State Court Action is removable to this Honorable Court, because it is a civil action, brought in state court, over which the district courts of the United States have original jurisdiction.

7. TSI is filing this Notice of Removal timely under 28 U.S.C. § 1446(b), because TSI is filing it within thirty (30) days after TSI’s receipt of the initial pleading setting forth the claims for relief by Plaintiff.

8. A copy of all process, pleadings and orders served upon Defendant TSI in the State Court Action is being filed with this Notice and is attached as Exhibit A.

WHEREFORE, Defendant TSI hereby removes the State Court Action to this Honorable Court.

Respectfully submitted,

/s/ Michael S. Hamlin

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been electronically filed via the CM/ECF system on this 2nd day of December 2022, and served upon plaintiff's counsel via electronic mail at rick@voytaslaw.com and tom@voytaslaw.com. Under penalties of perjury as provided by law, I certify that the statements in this affidavit are true.

/s/ Michael S. Hamlin